

LAW OFFICES OF MARC G. ALSTER, LLC
Two University Plaza, Suite 311
Hackensack, New Jersey 07601
(201) 883-1190
Attorney(s) for Debtor

NOTICE OF MOTION TO PERMIT AND APPROVE THE DEBTORS' SALE OF REAL PROPERTY LOCATED AT 60-62 PASSAIC STREET, PASSAIC, NEW JERSEY FREE AND CLEAR OF ALL LIENS.

TO:

Marie-Ann Greenberg, Ch. 13 Trustee
30 Two Bridges Road, Suite 230
Fairfield, New Jersey 07004

Jonathan C. Schwalb, Esq.
Attorney for Mortgage Company, SN Servicing Corp.
Friedman Vartolo, LLP
85 Broad Street, Suite 501
New York, New York 10004

Laura Munzer, Esq.
Real Estate Attorney for debtor
241 Hudson Street
Hackensack, New Jersey 07601

Benjamin A. Stanziale, Esq.
Estate Attorney for administratrix, Helen Stern
Stanziale & Stanziale, P.C.
29 Northfield Avenue, Suite 201
West Orange, New Jersey 07052

Stephen G. Herold, Realtor
Herold Real Estate & Appraisal Companies
480 Passaic Street
Hackensack, New Jersey 07601

Synchrony Bank - creditor
c/o PRA Receivables Management, LLC
P.O. Box 41021
Norfolk, VA 23541

Discover Bank
c/o Pressler & Pressler, LLP
Attorney for secured creditor/judgment lien holder
7 Entin Road
Parsippany, New Jersey 07054

Midland Funding, LLC
c/o Pressler & Pressler, LLP
Attorney for secured creditor/judgment lien-holder
7 Entin Road
Parsippany, New Jersey 07054

Melissa Wilson, Bankruptcy Specialist
Discover Bank - secured creditor/judgment lien holder
P.O. Box 3025
New Albany, OH 43054-3025

Angela Dery, Bankruptcy Specialist
Midland Credit Management, Inc. – secured creditor/judgment lien holder
P.O. Box 2011
Warren, MI 48090

To the Chapter 13 Trustee, all secured creditors listed on the debtor's bankruptcy petition and all creditors who filed notice of appearance and/or request for service of papers on this case.

PLEASE TAKE NOTICE that on February 16, 2022, at 10:00 a.m. or as soon thereafter as this matter may be heard at the United States Bankruptcy Court, located at 50 Walnut Street, Newark, New Jersey, the undersigned attorney for the debtor, Sophia A. Cyrwus, will apply for an Order directing as follows:

1. Authorizing the sale of the debtor's real property located at 60-62 Passaic Street, Passaic, New Jersey 07055 (pursuant to 11 U.S.C. Section 363) free and clear of all liens;
2. Authorizing payment of all supplemental Chapter 13 attorney fees previously and/or simultaneously ordered by the U.S. Bankruptcy Court for supplemental services provided on behalf of the debtor by the Law Offices of Marc G. Alster, LLC.
3. For an Order directing that upon the sale of the debtor's said real property, the settlement agent at the prospective closing shall turn over to the Chapter 13 Trustee the entire balance from the proceeds of the sale necessary to pay the Chapter 13 Trustee's Balance to Complete in full pursuant to the Chapter 13 Trustee's instructions therein; after full payment is made directly from the proceeds of

the sale to the debtor's secured creditors and the debtor's reasonable closing costs are paid, including but not limited to the fees for professional services rendered on behalf of the debtor, and

4. For such relief as the Court may deem just and proper.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

Pursuant to D.N.J. LBR 9013-1(d) et seq., if you wish to contest the within motion you do not agree with the relief being requested in the within motion or if you want the Court to consider your views on the motion, then within seven (7) days prior to the scheduled hearing you or your attorney must file your responding papers in opposition to this motion explaining your position(s), and send it to:

Clerk, United States Bankruptcy Court, 50 Walnut Street, P.O. Box 1532, Newark, New Jersey 07102.

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above. You must also mail copies to the following:

Marie-Ann Greenberg, Esq.
Chapter 13 Standing Trustee
30 Two Bridges Road, Suite 230
Fairfield, New Jersey 07004

Law Offices of Marc G. Alster, LLC
Attorney for the debtor
Two University Plaza, Suite 311
Hackensack, New Jersey 07601

IF YOU OPPOSE THE RELIEF REQUESTED HEREIN YOU SHOULD ATTEND THE HEARING CURRENTLY SCHEDULED TO BE HELD AT THE FOLLOWING TIME AND PLACE:

Judge: The Honorable Rosemary Gambardella
Date: February 16, 2022
Time: 10:00 a.m.
Place: United States Bankruptcy Court
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, New Jersey

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting relief.

Statement of Non-Necessity of Brief: The movant certifies pursuant to D.N.J. LBR 9013-2 that the within motion involves common questions of law and fact and does not involve complex or novel issues such as to require the submission of a legal brief.

Dated: January 14, 2022

/s/ Marc G. Alster

MARC G. ALSTER, ESQ.
Attorney for Debtor